

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO: 24-CR-20295-JB

Plaintiff,

vs.

BRYAN TOCHON-LOPEZ,
WILMER MOISES BARSELO,
JOSE FELICIANO LEMOS,
JESUS RODRIGUEZ,
LUIS ANDRES ZUNIAGA,
JORGE LUIS LOPEZ-ASTUDILLO,
EULIDES OLIVEROS-LUGO,
STIVEN JOSE FLORES

Defendants.

UNOPPOSED JOINT MOTION FOR CONTINUANCE OF TRIAL

Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO, and STIVEN JOSE FLORES**, by and through their counsel, and in accordance with *18 U.S.C. §3161(h)(7)* and *S.D. Fla. L.R. 7.6*, hereby file this Unopposed Joint Motion for Continuance of the currently set trial date. As grounds in support of this request, the Defendants state:

1. On or about June 26, 2024, the Defendants were interdicted by the United States Coast Guard.
2. On July 11th, 2024, the Government filed an indictment charging the Defendants with Conspiracy to Possess with Intent to Distribute a Controlled Substance While on Board a Vessel

Subject to the Jurisdiction of the United States (Count 1) and Possession with Intent to Distribute a Controlled Substance While On Board a Vessel Subject to the Jurisdiction of the United States.

3. On July 22nd, 2024, the Defendants were arraigned in this matter [DE 15, 16, 17, 18, 19, 20, 21, 22].

4. A jury trial is set for the two-week period commencing August 11, 2025, with a Calendar Call scheduled for August 5, 2025. [DE 109].

5. On July 21, 2025, defendants' counsel sent the Government a copy of the new Guidelines relating to role adjustments that are scheduled to go into effect on November 1, 2025.

6. The Government has advised that it will be reviewing the materials provided with the case agent and management team at the U.S. Attorney's Office.

7. The Government's position on role adjustments could make the difference in resolving this case via plea agreement as opposed to a contested sentencing hearing.

8. The Parties believe an additional 60 days is necessary for a global resolution of this matter to allow for productive discussions with the Government and to accommodate various scheduling conflicts. Specifically, undersigned counsel for Jorge Luis Lopez has a paid vacation out of the country from August 12 through August 27, 2025, and counsel for Stiven Jose Flores is unavailable from September 5 through September 15, 2025.

9. Accordingly, Defendants respectfully request that the trial date be continued to after mid-September 2025 to afford the Parties sufficient time to attempt to resolve this matter without the need for a trial and accommodate counsel's scheduling conflicts.

10. This Motion is being filed in good faith, in the interests of judicial economy, and in furtherance of providing Defendants effective assistance of counsel. This Motion is not being filed for purposes of undue delay.

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 88.9

On July 28, 2025, the undersigned conferred with AUSA Yvonne Rodriguez-Schack who advised that the Government does not object to the Court granting this Motion for Continuance. Additionally, after conferral with counsel for the codefendants, the codefendants join in the motion.

WHEREFORE, Defendants, **BRAYAN TOCHON-LOPEZ, WILMER MOISES BARSELO, JOSE FELICIANO LEMOS, JESUS RODRIGUEZ, LUIS ANDRES ZUNIAGA, JORGE LUIS LOPEZ-ASTUDILLO, EULIDES OLIVEROS-LUGO,** and **STIVEN JOSE FLORES,** respectfully pray that this Honorable Court grant the Defendants' Joint Motion for Continuance of trial, enter an Order continuing this case to sometime in mid-September, and for any other relief the Court deems proper and just under the circumstances.

Respectfully submitted,

QUINTERO BROCHE & FONSECA-NADER, P.A. <i>Attorney for Jorge Luis Lopez-Astudillo</i> BY: <u>/s/ Frank Quintero, Jr.</u> FRANK QUINTERO, JR. Florida Bar No.: 399167 75 Valencia Ave., Suite 800 Coral Gables, Florida 33134 Tel.: 305-446-0303/Fax: 305-446-4503 E-mail: fquintero@quinterolaw.net eservice@quinterolaw.net	FEDERAL PUBLIC DEFENDER <i>Attorney for Brayan Tochon-Lopez</i> BY: <u>/s/Srilekha Jayanthi</u> Srilekha Jayanthi Assistant Federal Public Defender 150 W. Flagler Street, Suite 1700 Miami, Florida 33130 Tel: (305) 530-7000 Email: srilekha_jayanthi@fd.org
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<p>ROGER CABRERA, PA <i>Attorney for Jesus Rodriguez</i></p> <p>BY: <u>/s/Roger DE Jesus Cabrera</u> Roger DE Jesus Cabrera Florida Bar No.: 148740 333 SE 2nd Avenue, Suite 2000 Miami, Florida 33131 Tel: (305) 823-8383 Fax: (305) 675-7970 Email: Roger@Cabrera.legal</p>	<p>LAW OFFICES OF JOSEPH A. CHAMBROT <i>Attorney for Luis Andres Zuniaga</i></p> <p>BY: <u>/s/Joseph Abraham Chambrot</u> Joseph Abraham Chambrot Florida Bar No.: 434566 1885 NW North River Drive Miami, Florida 33125 Tel: (305) 547-2101 Fax: (305) 547-2107 Email: joseph@chambrotlaw.com</p>
<p>BATISTA & BATISTA <i>Attorney for Eulides Oliveros-Lugo</i></p> <p>BY: <u>/s/Jose Rafael Esteban Batista</u> Jose Rafael Esteban Batista Florida Bar No.: 317251 7171 Coral Way, Suite 400 Miami, Florida 33155 Tel: (305) 267-5139 Fax: (305) 267-4108 Email: jrebatistalaw@gmail.com</p>	<p>CARAMES LAW <i>Attorney for Stiven Jose Flores</i></p> <p>BY: <u>/s/Dianne Elizabeth Carames</u> Dianne Elizabeth Carames Florida Bar No.: 68419 10 Canal Street, Suite 328 Miami Springs, Florida 33136 Tel: (305) 403-8063 Fax (305) 379-6668 Email: dianne@puglisicarames.com</p>

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was electronically filed via *CM/ECF* this 1st day of August 2025, and a courtesy copy of the foregoing furnished via email to all counsel of record.

BY: /s/ Frank Quintero, Jr.
FRANK QUINTERO, JR.
Fla. Bar 399167